

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

DIANE GRANDERSON,

Plaintiff,

**VS.**

QUIKTRIP CORPORATION d/b/a  
QUIKTRIP #670,

Defendant.

No. 4:20-cv-00786 RLW

## JOINT PROPOSED SCHEDULING PLAN

Pursuant to Federal Rules of Civil Procedure 16 and this Court's Order Setting Rule 16 Conference (ECF Doc. #8) entered June 22, 2020 the parties have conferred and submit the following Joint Proposed Scheduling Plan:

(a) Track Assignment. The parties agree with the Court that Track 2: Standard is the appropriate assignment for this case.

(b) Joinder of Parties / Amendments to Pleadings. All motions for joinder of additional parties or amendment of pleadings, if any, shall be filed no later than October 30, 2020.

(c) **Discovery Plan.**

i. The parties will adhere to the Federal Rules of Civil Procedure and relevant case law with regard to any discovery of Electronically Stored Information (“ESI”). No separate agreements regarding the discovery of ESI have been reached.

ii. The parties will adhere to the Federal Rules of Civil Procedure and relevant case law with regard to any issues of privilege. No separate agreements regarding privilege have been reached.

- iii. Initial disclosures pursuant to Rule 26 will be exchanged by August 7, 2020.
- iv. Discovery in this matter need not be conducted in phases.
- v. Plaintiff shall disclose all expert witnesses and shall provide the reports required by Federal Rules of Civil Procedure, Rule 26(a)(2), no later than October 30, 2020, and shall make expert witnesses available for deposition and complete depositions no later than November 30, 2020.
- vi. Defendant shall disclose all expert witnesses and shall provide the reports required by Federal Rules of Civil Procedure, Rule 26(a)(2), no later than December 1, 2020, and shall make expert witnesses available for deposition and complete depositions no later than December 30, 2020.
- vii. The presumptive limits of ten depositions per side, as set forth in Federal Rules of Civil Procedure, Rule 30(a)(2)(A), and twenty-five interrogatories per party, as set forth in Federal Rules of Civil Procedure, Rule 33(a), shall apply.
- viii. Requests for physical or mental examinations of parties pursuant to Federal Rules of Civil Procedure, Rule 35, shall be made no later than January 29, 2021, and any exam and report must be completed by February 26, 2021.
- ix. The parties shall complete all discovery in this case no later than February 26, 2021.
- x. As a COVID-19 precaution and pursuant to Federal Rule of Evidence 29(a), the parties stipulate to the voluntary use and attendance of depositions conducted by remote video conference applications, such as Zoom or WebEx meeting.
- xi. There are no matters pertinent to the completion of discovery in this case at this time.

(d) Mediation: referral to mediation or early neutral evaluation would be most productive after the completion of discovery.

(e) Dispositive Motions Any motions to dismiss, motions for summary judgment, and/or cross-motions for summary judgment shall be filed by March 26, 2021. The response to any dispositive motions shall be filed within 30 days of the filing of any such dispositive motion. All replies will be filed by no later than 10 days after the filing of the response;

(f) Trial: The earliest date by which this case should reasonably be expected to be ready for trial is May 3, 2021.


(g) Trial Length: This case will be tried in 2-3 days.

(h) Other Matters: There are no other relevant matters to be addressed in the Joint Proposed Scheduling Plan at this time.

Respectfully submitted,

THE STOKES LAW OFFICE

By: /s/

  
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By: /s/

  
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ATTORNEYS FOR DEFENDANT  
QUIKTRIP CORPORATION  
d/b/a QUIKTRIP #670

**CERTIFICATE OF SERVICE**

I hereby certify that on July 23, 2020, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/  \_\_\_\_\_